

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

NORTH SEA BRENT CRUDE OIL FUTURES 1:13-md-02475 (ALC)
LITIGATION

This document applies to:

1:13-cv-03473-ALC, 1:13-cv-03587-ALC,
1:13-cv-03944-ALC, 1:13-cv-04142-ALC,
1:13-cv-04553-ALC, 1:13-cv-04872-ALC,
1:13-cv-04938-ALC, 1:13-cv-05577-ALC,
1:13-cv-07089-ALC, 1:13-cv-08030-ALC,
1:13-cv-08151-ALC, 1:13-cv-08179-ALC,
1:13-cv-08240-ALC 1:13-cv-08270-ALC.

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**NOTICE OF MOTION TO DISMISS PLAINTIFFS' SECOND
AMENDED CONSOLIDATED CLASS ACTION COMPLAINT BY DEFENDANTS
SHELL INTERNATIONAL TRADING AND SHIPPING COMPANY LIMITED
AND SHELL TRADING (US) COMPANY**

PLEASE TAKE NOTICE that, upon the memoranda filed jointly by all Defendants and their Supplemental Memorandum of Law in Support of their Motion to Dismiss the Second Amended Consolidated Class Action Complaint, Defendants Shell International Trading and Shipping Company Limited ("STASCO") and Shell Trading (US) Company ("STUSCO") will move this Court before the Honorable Andrew L. Carter, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be set by the Court, for an Order dismissing Plaintiffs' Second Amended Consolidated Class Action Complaint (Case Nos. 1:13-cv-03473, 1:13-cv-03587, 1:13-cv-03944, 1:13-cv-04142, 1:13-cv-04553, 1:13-cv-04872, 1:13-cv-04938, 1:13-cv-05577, 1:13-cv-07089, 1:13-cv-08030, 1:13-cv-08151, 1:13-cv-08179, 1:13-cv-08240, and 1:13-cv-08270) with prejudice as to STASCO and STUSCO for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6) and, with

respect to STASCO, for lack of personal jurisdiction under Federal Rule of Civil Procedure 12(b)(2).

Dated: April 6, 2015

Respectfully submitted,

/s/ Steven A. Reed

Steven A. Reed

R. Brendan Fee

Dana E. Becker

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street

Philadelphia, PA 19103-2921

Telephone: (215) 963-5000

Facsimile: (215) 963-5001

sreed@morganlewis.com

bfee@morganlewis.com

dana.becker@morganlewis.com

-and-

Willard K. Tom

J. Clayton Everett, Jr.

MORGAN, LEWIS & BOCKIUS LLP

1111 Pennsylvania Avenue, NW

Washington, D.C. 20004

Telephone: (202) 739-3000

Facsimile: (202) 739-3001

wtom@morganlewis.com

jeverett@morganlewis.com

Counsel for Defendants,

Shell International Trading and Shipping Company
Limited and Shell Trading (US) Company

CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2015, the foregoing Notice of Motion to Dismiss Plaintiffs' Second Amended Consolidated Class Action Complaint by Defendants Shell International Trading and Shipping Company Limited and Shell Trading (US) Company was filed electronically with the Court and served electronically on all counsel of record who have entered an appearance through the Court's CM/ECF system.

/s/ R. Brendan Fee
Counsel for Defendants,
Shell International Trading and Shipping Company
Limited and Shell Trading (US) Company